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April 10, 2023

VIA ECF FILING

Honorable Marcia M. Henry, Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: MDL No. 3044, *In re: Exactech Polyethylene Orthopedic Products Liability Litigation*,
1:22-md-03044-NGG-MMH**

Dear Judge Henry:

I am writing with the agreement of Plaintiffs' Co-Lead Counsel. Pursuant to the Court's Minute Entry and Order dated March 23, 2023 (Dkt. # 165), the Exactech Defendants and Personal Injury Plaintiffs (the "Parties") have been negotiating a Joint Preservation Protocol to submit for the Court's consideration. Although the Parties have successfully negotiated the vast majority of the Joint Preservation Protocol, the Parties are still attempting to reach agreement on one final area of dispute. The Parties therefore respectfully request an additional 4 days, until April 14, 2023, to continue negotiations with the intention of submitting a Joint Preservation Protocol for the Court's consideration by the end of the week.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

FAEGRE DRINKER BIDDLE & REATH LLP

/s/ Michael J. Kanute

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U.S., Inc.***

cc: All Counsel of record (*via ECF*)